

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UMB BANK, N.A., as Trustee,

Plaintiff,

v.

SANOFI,

Defendant.

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Case No. 15 Civ. 8725 (GBD) (RWL)

ECF CASE

**DECLARATION OF STEFANIA D. VENEZIA**  
**IN SUPPORT OF SANOFI'S MOTION FOR SUMMARY JUDGMENT**  
**ON COUNTS I, II, AND VII OF THE SECOND AMENDED COMPLAINT**

I, Stefania D. Venezia, hereby declare, under penalty of perjury, as follows:

1. I am of counsel with the law firm of Weil, Gotshal & Manges LLP, counsel to Sanofi. I submit this Declaration in support of Sanofi's Motion for Summary Judgment on Counts I, II, and VII of the Second Amended Complaint.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the expert report of S. Albert Edwards (January 24, 2019).

3. Attached hereto as Exhibit B is a true and correct copy of excerpts from the deposition transcript of S. Albert Edwards (March 8, 2019).

4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the expert report of Richard Chin, M.D. (January 2019).

5. Attached hereto as Exhibit D is a true and correct copy of excerpts from the deposition transcript of Richard Chin, M.D. (March 11, 2019).

6. Attached hereto as Exhibit E is a true and correct copy of an excerpt from the expert report of Sidney P. Blum (January 17, 2019).

7. Attached hereto as Exhibit F is a true and correct copy of an excerpt from the deposition transcript of Dr. Manfred Caesar (March 14, 2019).

8. Attached hereto as Exhibit G is a true and correct copy of excerpts from the expert report of Steve J. Slovick (January 25, 2019).

9. Attached hereto as Exhibit H is a true and correct copy of excerpts from the deposition transcript of Steve J. Slovick (March 26, 2019).

10. Attached hereto as Exhibit I is a true and correct copy of excerpts from the expert report of Dr. Janice A. Phillips, Ph.D. (January 23, 2019).

11. Attached hereto as Exhibit J is a true and correct copy of excerpts from the expert report of David E. Smolin, Ph.D. (January 24, 2019).

12. Attached hereto as Exhibit K is a true and correct copy of excerpts from the deposition transcript of David E. Smolin, Ph.D. (March 20, 2019).

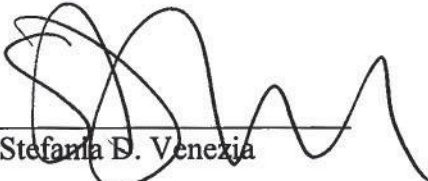
13. Attached hereto as Exhibit L is a true and correct copy of excerpts from the deposition transcript of Dr. Janice A. Phillips, Ph.D. (March 21, 2019).

14. Attached hereto as Exhibit M is a true and correct copy of excerpts of Sanofi's Form 20-F (December 31, 2018).

15. Attached hereto as Exhibit N is a true and correct copy of a Sanofi Press Release (November 14, 2014).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 13, 2019

  
Stefania D. Venexia